

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

ANANDA CAMARGO CHAVEZ,
Plaintiff,

v.

REBUILT BROKERAGE LLC d/b/a
REBUILT REALTY AND REBUILT
OFFERS LLC
Defendant.

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Case No. 1:24-cv-504-RP

JOINT MOTION TO EXTEND BRIEFING DEADLINES

COMES NOW, Plaintiff Ananda Camargo Chavez (“plaintiff”) and Defendant Rebuilt Brokerage LLC d/b/a Rebuilt Realty And Rebuilt Offers LLC (“Defendants”) (collectively the “Parties”), by and through counsel and for their Joint Motion to Extend Briefing Deadlines (“Joint Motion to Extend”), state:

I.

1. Plaintiff filed her Motion for Class Certification on March 20, 2025. Doc. 34.
2. Defendants’ response is currently due on April 3, 2025.
3. Class certification motions and responses are lengthy and complex motions with significant impact on the course of litigation.
4. Due to these factors, Defendants request additional time to respond to the class certification response.
5. Defendants seek a eighteen (18) day extension of the deadline for their response, which would set the new deadline as April 21, 2025.
6. Plaintiff has agreed to this request.
7. Plaintiff also requests additional time to file her Reply to Defendants’ Response.

8. Plaintiff seeks a seven (7) day extension of her Reply deadline, in addition to the seven days allowed for by the rules, which would set the new deadline as May 5, 2025.

9. Defendants have agreed to this request.

10. Therefore, in consideration of the foregoing, the Parties jointly request the Court enter the following briefing deadlines for Plaintiff's Motion for Class Certification:

a. Defendants' Response to Plaintiff's Motion is due on April 21, 2025;

b. Plaintiff's Reply to Defendant's Response is due on May 5, 2025;

11. The Parties do not seek an extension of any other dates currently set in this matter.

WHEREFORE, PREMISES CONSIDERED, the Parties jointly request this Court grant this Joint Motion to Extend Briefing Deadlines and set the deadline for Defendants' Response to Class Certification to April 21, 2025, and for Plaintiff's Reply to May 5, 2025.

AGREED AS TO FORM AND CONTENT, AND RESPECTFULLY SUBMITTED ON
MARCH 31ST, 2025:

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